

From: [Luna, Zolymar](#)
To: [Dan Gainer](#)
Cc: [Leshak, Andrea](#)
Subject: RE: Proteco Superfund Site: Request for Permission to Reduce Site Clearing and Survey Acreage
Date: Friday, December 10, 2021 10:23:23 AM
Attachments: [Exhibit A-1 from Deed No. 9 - Page 22 from Exhibit IX - Deed of Property.pdf](#)
[Page 181 from Brosval Chemicals, Inc. 2019 0523 Response to EPA RF1 PROTECO-2.pdf](#)

Dan,

EPA Region 2 has completed its review of the Request for Permission to Reduce Site Clearing and Surveyed at the Site as Stated in the Approved Site Clearing Plan (Request), which you submitted via email on November 30, 2021, on behalf of the PROTECO Generators Parties' Group. According to the Request, the proposed clearing area shown in the Figure 1 of the Site Clearing Plan (SCP), approved by EPA on October 4, 2021, is inconsistent with the boundary of the Site as defined in the RI/FS AOC, because it includes the clearing of approximately 10 additional acres that are outside of the Site boundary depicted on Figure 2 of the AOC.

After reviewing the information provided in the Request, EPA is hereby disapproving the Request. Please, note, that Figure 2 of the AOC, clearly indicates "Approximate Facility Boundary". In addition, the AOC states that the "Remedial Investigation ("RI") shall consist of collecting data to characterize site conditions, determining the nature and extent of the contamination at or from the Site, assessing risk to human health and the environment..." Furthermore, we note that reducing the area to be cleared is not only inconsistent with the objectives of the AOC, but it may also delay the investigation and potentially increase risk of exposure to contaminated media.

A review of historical information indicates that the area depicted and described in the SCP, approved by EPA on October 4, 2021, appears to largely capture the area that should be investigated as part of the RI. Attached, we have included additional drawings and imagery from Google Earth Pro that validate the information included in the approved SCP. Please note that as more information becomes available, EPA may determine that additional areas, beyond the area depicted in the SCP, should be investigated as well.

If you have additional questions and/or comments on this matter, please let us know.

Regards,

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From: Dan Gainer <dgainer@demaximis.com>
Sent: Tuesday, November 30, 2021 5:33 PM
To: Leshak, Andrea <leshak.andrea@epa.gov>; Luna, Zolymar <Luna.Zolymar@epa.gov>
Subject: Proteco Superfund Site: Request for Permission to Reduce Site Clearing and Survey Acreage

Hello,

The attached letter is a request by the PROTECO Site Generators Parties' Group for EPA's permission to reduce the acreage to be cleared and surveyed at the Site.

Please contact me if you have any questions or need additional information.

Best Regards,

Dan Gainer, PG CSM

Project Coordinator

de maximis, inc.

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